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ALLIANCES IN MEXICO
AND SRI LANKA

November 21, 2022

VIA ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*Ms Bussiere is
approved for an additional
200 hours (at \$90 per hour)
per tunc
200 hours (nunc pro tunc)
in March 23, 2022.
S.O. ORDERED
J. J. Math, VSDJ.
11-22-22*

Re: United States v. David Lopez-Pagan, No. 21-cr-00640 (PKC)

Dear Judge Castel:

We are the attorneys for David Lopez-Pagan. On October 28, 2021, your Honor issued an Order permitting my associate, Arletta Bussiere, to bill for up to 100 hours at \$90 per hour for her work on Mr. Lopez-Pagan's case. (ECF 33). Due the large amount of ongoing discovery from the government, unanticipated legal research and writing caused by the unusual case facts, and extended plea negotiations, Ms. Bussiere reached 100 hours on March 23, 2022. She has since contributed over 130 hours to Mr. Lopez-Pagan's case, assisting with additional discovery review, legal research and writing, client meetings, and case management. I also anticipate that Ms. Bussiere will contribute significantly to Mr. Lopez-Pagan's sentencing memorandum and hearing preparation. Accordingly, I write to request approval for Ms. Bussiere to bill up to an additional 250 hours for her past and future work on this case.

For the Court's convenience, we have included a "So Ordered Nunc Pro Tunc" line should the Court grant our request. Thank you for your consideration.

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

cc: All Counsel of Record (Via ECF)

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Honorable P. Kevin Castel
November 21, 2022
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SO ORDERED NUNC PRO TUNC

Honorable P. Kevin Castel, U.S.D.J.